

## **REMARKS**

The Office Action mailed January 23, 2008 has been received and carefully noted. Claims 1-12 are currently pending in the subject application and are presently under consideration.

Claims 1-4, 6, 7, and 10 have been amended herein. A listing of claims can be found on pages 4-8 of this Reply.

Favorable reconsideration of the pending claims is respectfully requested in view of the amendments and the following comments.

### **I. Priority Claim**

It is noted that a certified English translation of the priority document is required to obtain the benefit of the earlier priority date. However, as the Applicants have made substantive arguments against the cited references and are not relying on antedating the reference dates, a certified English translation of the priority document is not required at this time. However, the Applicants reserve the right to submit a certified English translation of the priority document if the Applicants so choose to at a later time.

### **II. Objection to the Drawings**

The drawings were objected to for minor discrepancies between the specification and the drawings, in particular the labeling of items 210 and 220 of Figure 2. The labeling has been corrected. Withdrawal of this objection is respectfully requested.

### **III. Objection to the Specification**

The specification was objected to for a minor informality on page 11, line 7, where "initial object descriptor 310" does not match the labeling of the corresponding item in Figure 3. The specification has been amended as "initial object descriptor 331"

to match the labeling of the drawing. Withdrawal of this objection is respectfully requested.

#### **IV. Objection to the Claims**

Claim 3 was objected to for insufficient antecedent basis for the limitation “the MPEG-4 contents storage unit.” This limitation has been amended as “an MPEG-4 contents storage unit.” Withdrawal of this objection is respectfully requested.

#### **V. Rejection of Claims 1-4 Under 35 U.S.C. § 102(a)**

Claims 1-4 stand rejected under 35 U.S.C. § 102(a) as being anticipated by Martinez *et al.* ("Authoring 744: First Results" pgs. 203-206, *Multimedia '02*, December 1-6, 2002, ACM). It is respectfully requested that these rejections be withdrawn for at least the following reason. Martinez *et al.* does not disclose each and every element of the claims as amended.

The present application is directed to using MPEG-7 description techniques in retrieving object-based audio visual (AV) contents in MPEG-4 format. MPEG-7 descriptions are generated from MPEG-4 contents stored in the MPEG-4 contents storage unit.

In particular, amended independent claims 1 and 4 recite: “the MPEG-7 descriptions are generated from the object-based MPEG-4 contents.” This added limitation describes the particular manner in which MPEG-7 descriptions are generated. The MPEG-7 descriptions are descriptions of object-based MPEG-4 contents and are generated specifically from these MPEG-4 contents, rather than from, for example, an input submitted by a user.

The Examiner offers Martinez *et al.* at pg. 204, section 3, paragraph 2, lines 1-4 as relating to a similar limitation (See Office Action mailed January 23, 2008, pg. 5). However, at the cited passage, Martinez *et al.* describes a “ScriptWriter Tool” which allows the **user** to create MPEG-7 descriptions. These MPEG-7 descriptions are then

used to create MPEG-4 XMT files. Therefore, the MPEG-7 descriptions are not generated from the object-based MPEG-4 contents, as recited in the amended claims, but rather from a user of the “ScriptWriter Tool.”

Further, independent claim 1 recites: “an extensible description/binary converter for receiving the XML based textual format file including the MPEG-7 descriptions generated by the extensible description generator, and generating them as a binary file.” It is noted that an MPEG-7 description is necessarily generated for every object of contents. For example, when the contents include N objects (sound, image, scent, *etc.*), the number of generated MPEG-7 descriptions is N as well. Martinez *et al.* does not disclose this aspect.

Martinez *et al.* discloses the converting an MPEG-7 description generated by a MPEG-7 ScriptWriter into a binary MPEG-4 file. Martinez *et al.* generates one MPEG-7 description with respect to the total contents, different from the subject claims. Martinez *et al.* generates XTM-A representation of the MPEG-7 description using a 724T transcoder, as shown in FIG. 2. Accordingly, Martinez *et al.* does not disclose the feature of generating the MPEG-7 description for every object of the contents.

Accordingly, Martinez *et al.* fails to teach or suggest such aspects of the independent claims. The dependent claims are also not anticipated for the same reasons. Withdrawal of these rejections is respectfully requested.

## **VI. Rejection of Claims 10-12 Under 35 U.S.C. § 102(b)**

Claims 10-12 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Bober *et al.* (“A MPEG-4/7 based Internet Video and Still Image Browsing System”; *Proceedings of the SPIE* Vol. 4209, March 22, 2001). It is respectfully requested that these rejections be withdrawn for at least the following reason. Bober *et al.* does not disclose each and every element of the claims. Amended independent claim 10 recites: “the MPEG-7 description information is generated from the object-based MPEG-4 contents.” The Examiner does not indicate and the Applicants do not discern any part of Bober *et*

*al.* that discloses this aspect. The dependent claims are also not anticipated for the same reasons. Withdrawal of these rejections is respectfully requested.

**VII. Rejection of Claim 5 Under 35 U.S.C. § 103(a)**

Claim 5 stands rejected under 35 U.S.C. § 103(a) as being obvious over Martinez *et al.*, in view of Ryu *et al.* ("MPEG-7 Metadata Authoring Tool" pgs. 267-270, *Multimedia '02*, December 1-6, 2002, ACM). Claim 5 depends from independent claim 4. The Examiner does not indicate and the Applicants do not discern that Ryu *et al.* cures the aforementioned deficiencies of Martinez *et al.* regarding independent claim 4. Thus, the cited references, combined, do not teach or suggest all the limitations of claim 5 for at least the reasons stated above relating to independent claim 4. It is respectfully requested that this rejection be withdrawn.

**VIII. Rejection of Claims 6, 7, and 9 Under 35 U.S.C. § 103(a)**

Claims 6, 7, and 9 stand rejected under 35 U.S.C. § 103(a) as being obvious over Martinez *et al.*, in view of Bober *et al.* It is respectfully requested that these rejections be withdrawn for at least the following reason. Martinez *et al.* and Bober *et al.*, alone or in combination, do not teach or suggest all the limitations of the claims. Amended independent claim 6 recites: "the MPEG-7 descriptions are generated from the object-based MPEG-4 contents." The Examiner does not indicate and the Applicants do not discern any part of Bober *et al.* that cures the aforementioned deficiencies of Martinez *et al.* regarding this aspect. For the reasons mentioned above regarding this aspect, Martinez *et al.* and Bober *et al.*, alone or in combination, do not teach or suggest all the limitations of the claims. The dependent claims are also not obvious for the same reasons. Withdrawal of these rejections is respectfully requested.

**IX. Rejection of Claim 8 Under 35 U.S.C. § 103(a)**

Claim 8 stands rejected under 35 U.S.C. § 103(a) as being obvious over Martinez *et al.*, Bober *et al.*, and Ryu *et al.* Claim 8 depends from independent claim 6. The Examiner does not indicate and the Applicants do not discern that Ryu *et al.* or Bober *et al.* that cures the aforementioned deficiencies of Martinez *et al.* regarding independent claim 6. Thus, the cited references, combined, do not teach or suggest all the limitations of claim 8 for at least the reasons stated above relating to independent claim 6. It is respectfully requested that this rejection be withdrawn.

## CONCLUSION

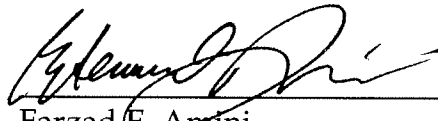
In view of the foregoing, it is believed that all claims now pending patentably define the subject invention over the prior art of record, and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes a telephone conference would be useful in moving the case forward, he is encouraged to contact the undersigned at (310) 207-8300.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2666 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly extension of time fees.

Respectfully submitted,

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Date: May 23, 2008



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## **CERTIFICATE OF TRANSMISSION**

I hereby certify that this correspondence is being submitted to the United States Patent and Trademark Office electronically via EFS Web on the date shown below.

  
Robert Fiore

5/23/08  
Date